

## REMARKS

By the Amendment, Applicants amend claims 12, 15, and 16, and add new claims 18-26 to address other aspects of the present invention. Upon entry of this Amendment, claims 12 and 15-26 will be pending.

In the Office Action, the Examiner objected to the specification; rejected claims 12 and 15-17 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,058,397 to Barrus et al. (“Barrus”) in view of Hon Wai Chun et al. “Intelligent critic system for architectural design,” IEEE Transactions on Knowledge and Data Engineering, Vol. 9, Issue 4, July-August 1997, pp. 625-639 (“Chun”) and U.S. Patent No. 5,796,395 to Maurice de Hond (“Maurice”)<sup>1</sup>

### Regarding the objection to the specification

Applicants respectfully traverse the objection to the specification. The Office Action alleges that “[t]here is no disclosure in the specification of a ‘computer-readable recording medium.’” (Office Action at page 2.) Applicants respectfully disagree.

Applicants submit that the present application provides sufficient disclosure of a “computer-readable recording medium.” For example, the application discloses “RAM 103”, “ROM (PROGRAM ETC.) 102”, “LANDFORM DATA ROM 109”, “SHAPE DATA ROM 111”, “BUFFER 103A”, “TEXTURE DATA ROM 113”, and “TEXTURE MAP RAM 114” in FIG. 1; and “CDROM”, “BOOT ROM”, “GRAPHIC MEMORY”, and “AUDIO MEMORY” in FIG. 16. Accordingly, Applicants respectfully request withdrawal of the objection to the specification.

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<sup>1</sup> The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

**Regarding the rejection under 35 U.S.C. § 103(a)**

Applicants respectfully traverse the rejection of claims 12 and 15-17 under 35 U.S.C. § 103(a) as being unpatentable over Barrus in view of Chun and Maurice, because a *prima facie* case of obviousness has not been established.

To establish a *prima facie* case of obviousness based on a combination or suggestion of prior art, “Office personnel must articulate . . . a finding that the prior art included each element claimed, although not necessarily in a single prior art reference, with the only difference between the claimed invention and the prior art being the lack of actual combination of the elements in a single prior art reference.” M.P.E.P. § 2143.A (8<sup>th</sup> edition, revision 6).

Independent claim 12, as amended,<sup>2</sup> recites a combination including, for example, “wherein the plurality of arrangement rules include at least: a first arrangement rule for deciding on one of any of the areas with a table of random numbers; a second arrangement rule for arranging the components in an order of size and discarding remaining components that do not fit due to lack of space; and a third arrangement rule for expanding or reducing any of the areas relative to a peripheral area according to arrangement of the components.” Barrus fails to teach or suggest at least these features of amended claim 12.

Barrus teaches “[a] virtual reality environment creation, modification and delivery system [that] stores information representing the virtual reality environment in a database where portions of it may be created, modified or delivered without affecting other portions. The database may be accessed, for example, over a network such as a

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<sup>2</sup> Support for the amendments may be found at, for example, page 20 of the specification.

wide area network, to allow database records to be individually updated without affecting other records in the database.” Barrus, Abstract. However, Barrus fails to teach or suggest the above recited features of amended claim 1.

Chun fails to cure the deficiencies of Barrus. The Examiner alleges that “Chun et al. teaches . . . characteristics of the plurality of areas, such as a kitchen area or a bedroom area, are used to define which components should be selected for a particular area, since a stove, refrigerator and/or dining room table would be possible components for a kitchen area but would not belong in a bedroom area/locale and thus a first parameter would include information regarding the type of area being generated/modified.” (Office Action at page 5.) Applicants respectfully disagree.

However, even assuming the Examiner’s allegation is true, which Applicants do not concede, Chun’s alleged teaching of arranging certain components in room areas does not constitute the above recited features of amended claim 12.

Maurice fails to cure the deficiencies of Barrus and Chun. Maurice teaches “[a] method for publishing and searching interests of individuals, the method including . . . generating graphics having the general appearance of a plurality of houses after the search is performed, in which the houses are respectively selectable by the user, and communicating to the user who uses the search request form the interests of the user associated with a house if that house is selected.” Maurice, Abstract. However, Maurice’s teaching of selecting houses by the user does not constitute the above recited features of amended claim 12.

Applicants further point out that above recited features of amended claim 12 may be advantageous over applied prior art references in replying to needs including

reducing operational load, while automatically arranging objects in a three-dimensional room.

Therefore, Barrus, Chun, and Maurice, taken alone or in any reasonable combination, fail to teach or suggest all elements of amended claim 12. A *prima facie* case of obviousness has not been established. Accordingly, Applicants respectfully request withdrawal of the Section 103(a) rejection of amended claim 12. Because claim 17 depends from claim 12, Applicants also request withdrawal of the Section 103(a) rejection of claim 17 for at least the same reasons stated above.

Further, amended independent claims 15 and 16, while of different scope, include similar recitations to those of amended claim 12. Amended claims 15 and 16 are therefore also allowable for at least the same reasons stated above with respect to amended claim 12. Applicants also respectfully request withdrawal of the Section 103(a) rejection of amended claims 15 and 16.

#### **Regarding the newly added claim**

Applicants have added claims 18-26 to address other aspects of the present invention. Support for claims 18-26 may be found at, for example, page 20 of the specification. Claims 18-26 are also allowable at least due to their dependencies upon one of amended claims 12, 15, and 16. Further, Barrus, Chun, and Maurice fail to teach or suggest at least “wherein the components include daily articles and wall objects; and the daily articles and wall objects are arranged last,” as recited in claims 18, 21, and 24; “wherein the components are arranged in each area based on a type of the area; and the type is one of at least a corner, a wall, a center, and a ceiling,” as recited in claims

19, 22, and 25; and "wherein the characteristics includes at least tidy, untidy, deserted, and warehouse," as recited in claims 20, 23, and 26.

**Conclusion**

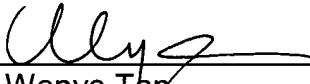
In view of the foregoing amendments and remarks, Applicant respectfully requests reconsideration of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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